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Via E-mail: National.List@usda.gov

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

The International Pectin Producers' Association (IPPA) an international non-governmental organization, thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. The member companies of IPPA are Cargill, CPKelco, Danisco, Degussa, Herbstreith and Fox KG, and Obipektin. We ask for continuance of the following items on the National List. Both high ester and low ester pectins have been provided to our customers for use in organic products, and we wish to provide support for both these materials.

1. Pectin (high methoxy) §205.606 Non organically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).

High methoxy pectin is produced by extraction from natural edible plant sources, usually citrus fruit or apple after expression of the juice.

IPPA recommends that pectin (high methoxy) remain on the list as per the original evaluation by the NOSB that pectin (high methoxy) is:

1. Not harmful to human health or the environment
2. Necessary to supplement the natural pectin content in fruit products, and/or because there is no available organic alternative.
3. Consistent and compatible with organic practices.

Safety and toxicology data has been submitted to and reviewed by both JECFA and US FDA, who have concluded that pectins of all types are not harmful to human health. In the US, all pectins are regarded as GRAS. JECFA have granted pectins an ADI “not specified”.

Pectin (low methoxy) §205.605 Nonagricultural (non organic) substances allowed as ingredients in on or processed products labeled as “organic” or “made with organic (specified ingredients or food groups(s)).

Low methoxy pectins can be divided into two classes, depending on whether or not they have been reacted with ammonia, which transforms some of the ester groups in the pectin molecule into carboxylate ester groups, which do not occur in pectins in nature.

We would contend that non-amidated low methoxy pectins should rather be classified along with high methoxy pectins under §205.606, as similar pectins can be found in nature, and they contain the same chemical groupings, although in different proportions, as the high ester materials. Low methoxy pectins containing amide groupings could well remain (perhaps under the title of “amidated pectins”) in listing §205.605.

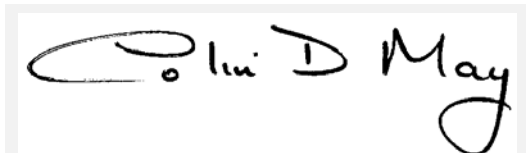
General Information. Pectins of all types do not contribute adverse environmental impact to the environment or humans either during production or end-use. During manufacturing processes, any waste materials are either biologically treated to produce nonpolluting effluent, or discharged to municipal sewage treatment plant for comparable treatment. Pectins of all types are readily biodegradable, and have insignificant effect on the environment. Much larger quantities of pectic materials are present in a wide range of plant materials.

Pectins are natural polymers extracted from plants. Some modification occurs during extraction in the presence of acid, comparable to cooking acidic fruit. Such processing also reduces the proportion of naturally-occurring ester groups, and can lead to either high or low ester pectins, depending on precise conditions. There is no more natural alternative product for the manufacture of jams, or low sugar fruit spreads, or for many other applications. For fruits low in pectin, and especially for low sugar products, there is no alternative process which would avoid the need for added pectin. Only low ester pectins are effective in low sugar (less than ca. 60% soluble solids) products.

IPPA therefore recommends

- a) that pectin (high methoxy) remain on list §205.606 Non organically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s))”, and that pectin (low methoxy non-amidated) should be transferred to that list.
- b) that pectin (low methoxy amidated) should remain on list §205.605 Nonagricultural (non organic) substances allowed as ingredients in on or processed products labeled as “organic” or “made with organic (specified ingredients or food groups(s)).

Yours sincerely,

A handwritten signature in black ink that reads "Colin D May". The signature is written in a cursive, flowing style. The first name "Colin" is written in a larger, more prominent script, followed by "D" and "May". The signature is enclosed within a thin black rectangular border.

Dr. Colin D May - Executive Secretary